1. For digital stations, the proposed enabling of station identification "...in the emission used...".
The major problem with this is should you experience interference by a digital station (not identifying with CW), unless you have a device capable of decoding the offending signal you won't know who the station control operator is. This could be especially problematic for portable, mobile, and emergency stations using a bare minimum of equipment.

2. The assertion that "there is a pronounced trend in the Amateur Service toward digital communications".
Although digital communications is gaining popularity, I disagree that there is a "pronounced trend". As I tune across the amateur HF bands I hear mostly voice communications followed by CW, and the rest "digital" (RTTY, PSK31, PACTOR, CLOVER and so-on). Note that I am absolutely in favor of promoting & fostering new digital modes. In fact, it would be beneficial to allow higher speed digital modes in the HF spectrum using the proposed 3.5 kHz bandwidth--however, digital modes (including automated stations) should be strictly limited to the "middle" of the HF bands between the lower speed modes and traditional voice and image communications.
This frequency range should be set-forth as the frontier for developing and advancing these technologies in the amateur service.

I agree that the current regulatory structure doesn't accommodate data modes with high symbol rates (below 30 MHz). As I suggested above, the rules should be revised to allow for data emissions at 3.5 kHz bandwidth--but let this bandwidth, assigned within appropriate spectrum, determine the maximum throughput.

3. If the ARRL petition is accepted as the format for the Notice of Proposed Rule Making, 160 meters should be segmented in a similar manner to the other HF bands; that is, there should be a lower frequency limit on the wider bandwidths--3.5 kHz should not be allowed throughout the entire band.

To summarize: 1. digital station ID should remain in CW; 2. revise the rules to accommodate higher speed digital modes within a 3.5 kHz bandwidth and do away with the "symbol-rate" limitation; and 3. apply bandwidth segmentation to the 160 meter band also.

Respectfully submitted by Alvin Sewell – N4SGQ, Pensacola, Florida